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*Attorneys for Plaintiffs and proposed  
collective action and class action members*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----x  
**BRANDON SALUS, ALAN FELIX  
IPANAQUE CORDOVA, and BRANDON  
RUCKDASHEL on behalf of themselves and  
others similarly situated,**

INDEX NO: 07cv03142-GBD-DCF

**NOTICE OF MOTION**

**Plaintiffs,**

v.

**TSE GROUP LLC d/b/a B.B. KING BLUES  
CLUB AND GRILL and TSION  
BENSUSAN**

**Defendants.**

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PLEASE TAKE NOTICE that upon the accompanying Motion together  
with the Settlement Agreement and all agreements attached thereto, the undersigned will  
and hereby do move this Court before the Honorable George B. Daniels, United States  
District Court, Southern District of New York, 500 Pearl Street, New York, NY 10007,  
on a date to be determined by the Court or as soon thereafter as counsel may be heard for

an order preliminarily approving the class action settlement agreement and notice to the class.

Dated: December 21, 2007  
New York, New York

JOSEPH & HERZFELD LLP

/s/ D. Maimon Kirschenbaum  
By: D. Maimon Kirschenbaum (DK-2338)  
Charles E. Joseph (CJ-9442)

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